

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

CONEISHA L. SHERROD,

Plaintiff,

vs.

UNITED WAY OF TARRANT COUNTY,

Defendant.

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Civil Action No. 4:17:cv-00758-O

PLAINTIFF'S EXHIBIT LIST

No.	Date Offered	Marked	Admitted	Description	Bates Stamp
1				Smyers Email Re: Recap-Complaints Concerning Finance Staff (2/14/17), dated 2-15-17	Sherrod 0001-02
2				Boyd Memo Re: Complaint, dated 2-14-17 with email dated 2-16-17	Sherrod 00004-10
3				Castrellon email Re: Statement of Report, dated 2-22-17	Sherrod 00011-12
4				Boyd email Re: FW: form 1295, dated 1-27-17	Sherrod 00017-20
5				Sherrod email Re: Fwd: Reminder- Out of Office (Coneisha), dated 2-17-17	Sherrod 00021-22
6				Smyers/Sherrod email chain Re: Finance, dated 2-22-17	Sherrod 00023-24
7				Smyers/Jones email chain Re: Executive Staffing of Board & Committee Meetings, dated 2-23-17	Sherrod 00025-27

No.	Date Offered	Marked	Admitted	Description	Bates Stamp
8				Boyd/Sherrod email chain Re: Fwd: Monthly Meeting with TD Smyers and Coneisha Sherrod, dated 2-28-17	Sherrod 00028-30
9				Sherrod email Re: Fwd: Just an FYI, dated 3-2-17	Sherrod 00031-33
10				Smyers email chain Re: Accepted: Monthly (February) Meeting with TD and Coneisha, dated 3-2-17	Sherrod 00034-37
11				Sherrod email chain Re: Formal Complaint, dated 3-2-17	Sherrod 00038-41
12				Sherrod email, Re: Recap-Complaints Concerning Finance Staff (2/14/17), dated 2-15-17	Sherrod 00042-43
13				Booker email chain Re: Immediate Employee Resignation 03/03/2017, dated 3-3-17	Sherrod 00044-45
14				McKinney email Re: Employee Matter, dated 2-4-16	Sherrod 00091
15				Jones email Re: February 19, 2016, dated 2-12-16	Sherrod 00092
16				Jones letter to Sherrod, dated 5-19-16	Sherrod 00093
17				Dixon letter to Sherrod, dated 9-17-13	Sherrod 00094
18				United Way Planning Committee Photos, 2016	Sherrod 00137-141
19				Djordjevic email Re: Congratulations: Your Appointment on United Way Talent Advisory Council, dated 11-29-16	Sherrod 00142-143
20				Boyd email Re: Thank You!, dated 2-22-16	Sherrod 00145

No.	Date Offered	Marked	Admitted	Description	Bates Stamp
21				Sherrod Request Time Off, March 2017	Sherrod 00147
22				Sherrod Performance Documents, 2014-2016	Sherrod 00148-165
23				Sherrod Job Description, 2015	Sherrod 00166-167
24				McKinney email Re: Salaries, dated 2-9-17	Sherrod 00170
25				McKinney income documents, 2010-2011	Sherrod 00171-175
26				McKinney income documents dated 8-14-08	Sherrod 00215
27				Sherrod emails Re: FW: United Way: Leah King Resume, dated 5-17-16	Sherrod 00219
28				McKinney letter and attachment dated 7-1-15	Sherrod 00220-223
29				Sherrod email Re: Employee Relations Meeting, dated 8-15-16	Sherrod 00224-225
30				Incident Report Re: Britton Pavlic, VP Finance and Controller, dated 7-25-16	Sherrod 00226-227
31				Netherland email chain Re: Time Cards, dated 7-25-16	Sherrod 00228-229
32				Sherrod email chain Re: Internal Complaint – June 6, 2016, dated 9-26-16	Sherrod 00230
33				Spiker email Re: Tim McKinney's Incentive Compensation, dated 9-26-15	Sherrod 00231
34				CEO Bonus Authorization dated 10-11-16	Sherrod 00232
35				Sherrod email chain Re: Executive Presence – One Month Later, dated 10-16-14	Sherrod 00233-235

No.	Date Offered	Marked	Admitted	Description	Bates Stamp
36				United Way of Tarrant County Organization Goals & Objectives, June 2013	Sherrod 00236-247
37				Vita letter dated 5-13-14	Sherrod 00248-250
38				403b Letters dated 5-16-14	Sherrod 00251-294
39				Vita email Re: Corrective Contribution Payment, dated 5-15-14	Sherrod 00295
40				Griffin letter to IRS with attachments dated 5-29-14	Sherrod 00296-457
41				403b Plan emails date 1-31-17	Sherrod 00458-461
42				Sherrod Designation of Authorized Representative Form dated 11-8-13	Sherrod 00462
43				Sherrod email chain Re: Verification of Contact Info: United Way of Tarrant County, dated 11-8-13	Sherrod 00463-464
44				Retirement Plan Documents, 2016-2017	Sherrod 00465-550
45				Booker email dated 1-19-16 Re: Tim McKinney's Base Pay	Sherrod 00551-52
46				Wallace email Re: FW: Draft: Compensation and Benefits Committee (Recommendations for Approval), dated 1-8-16	Sherrod 00554-59
47				McKinney Letter to Lee dated 7-1-2015	Sherrod 00560-63
48				Succession Planning Sub-Committee Minutes dated 1-20-15	Sherrod 00564-66

No.	Date Offered	Marked	Admitted	Description	Bates Stamp
49				Succession Planning Sub-Committee Minutes dated 3-17-15	Sherrod 00564-66
50				Smyers email RE: Employment Status, dated 3-3-17	Sherrod 00569
51				McKinney email Re: Coneisha sent you a message, dated 3-6-2017	Sherrod 00573-75
52				McKinney letter to Sherrod Re: termination, resignation, and severance, dated 3-8-17	Sherrod 00576-82
53				Board and Committee Lists	Sherrod 00583-646
54				Bylaws 2017	Sherrod 00654-74
55				Minutes dated 11-18-14	Sherrod 00737-45
56				Notes for 11-30-14 Financial Statements – Total Assets	Sherrod 00746 - 52
57				Email from Sherrod Re: Formal Complaint, dated 3-2-17	Sherrod 0787-88
58				Sherrod email Re: Formal Complaint (TD Smyers), dated 3-2-17	Sherrod 00789-90
59				Notes for 1-31-15 Financial Statements	Sherrod 00803-12
60				Bylaws 2015	Sherrod 00822-41
61				McKinney email chain Re: EXTERNAL: Human resources related decisions, dated 6-19-16	Sherrod 00990-992
62				Sherrod email chain Re: Trust, dated 6-23-16	Sherrod 00993-994

No.	Date Offered	Marked	Admitted	Description	Bates Stamp
63				Internal Investigation Report Re: Marilyn Jones, dated 7-6-16	Sherrod 00995-996
64				Stewart email Re: May 23rd, dated 7-12-16	Sherrod 00997
65				Jones email Re: Follow-up, dated 7-13-16	Sherrod 00998
66				Jones Memo Re: Don Smith, dated 7-11-16	Sherrod 00999-1002
67				Complaint of Inappropriate Behavior Re: Don Smith	Sherrod 01003-1004
68				Smith email chain Re: Chelsea Guidry, dated 6-21-16	Sherrod 01005-1010
69				Notes for June 30, 2014 Financial Statements	Sherrod 01022-1033
70				McKinney Letter Re: President's Report, dated 9-18-15	Sherrod 01164-1166
71				Internal Investigation Report re: Stewart, dated 9-1-16	Sherrod 01191-1192
72				Jones Memo Re: Record of Conversation Unacceptable Conduct and Performance Review (L. Stewart), dated 10-8-16	Sherrod 01194-1197
73				Stewart email Re: My deepest apologies, dated 9-19-16	Sherrod 01198-1199
74				Matkin Memo Re: Unprofessional Behavior of L. Stewart, dated 9-19-16	Sherrod 01200-1205

No.	Date Offered	Marked	Admitted	Description	Bates Stamp
75				Stewart memo Re: Modified Performance Review – September 8, 2016, dated 9-9-16	Sherrod 01208-1212
76				Jones memo Re: Record of Conversation of Follow-up Meeting: Unacceptable Conduct and Performance Review (L. Stewart), dated 10-19-16	Sherrod 01213-1217
77				Financial Statements, Year Ended June 30, 2015	Sherrod 01246-1279
78				Official Code of Ethics, Revised: Jan. 15, 2008)	Sherrod 01418-1429
79				Sherrod email chain Re: Formal Complaint, dated 3-2-17	Sherrod 01447-1450
80				Sherrod income documents for 2017	Sherrod 01519-1526
81				Sherrod Resume	Sherrod 01530-1531
82				Employee Handbook (Last Revised: 9/26/2016)	Sherrod 01532-1764
83				Clark email Re: FW: ERISA Attorney, dated 3-24-14	Sherrod 01765-1766
84				Sherrod Earnings Statements and Benefits Info, 2016	Sherrod 01767-1822
85				Sherrod pay stubs, 2016	Sherrod 01850-1852
86				McKinney email chain Re: Fwd: February 19, 2016, dated 2-12-16	Sherrod 01853-1854

No.	Date Offered	Marked	Admitted	Description	Bates Stamp
87				Sherrod letter to City of Fort Worth Human Relations Unit, dated 3-6-17	Sherrod 01869-1871
88				McKinney email chain Re: United Way of Tarrant County, dated 7-22-16	Sherrod 01891-1893
89				Sherrod email Re: FW: Internal Complaint – June 6, 2016, dated 9-26-16	Sherrod 01894
90				Investigation Report re: McKinney, Smyers, and Buehler dated 9-14-16	Sherrod 01895-1899
91				Hunt letter Re: Marilyn Jones, dated 2-19-15	Sherrod 01900-1904
92				McKinney email chain Re: M. Jones Correspondence, dated 4-7-15	Sherrod 01905-1906
93				MacLeod letter Re: Marilyn Jones, dated 4-2-15	Sherrod 01907-1908
94				Moody email Re: FW: Please pay this today, dated 2-22-17	Sherrod 01912-1913
95				Moody memo to Sherrod, dated 2-13-17	Sherrod 01914
96				Moody email Re: HR issues, dated 2-13-17	Sherrod 01915-1916
97				Snow email Re: Statement and Job Duties, dated 2-10-17	Sherrod 01917-1920
98				Netherland letter to Sherrod, dated 2-14-17	Sherrod 01921-1922
99				Netherland email Re: Morning Conversation, dated 2-14-17	Sherrod 01923

No.	Date Offered	Marked	Admitted	Description	Bates Stamp
100				Stacy email Re: Our meeting 2/14/17, dated 2-14-17	Sherrod 01924-1926
101				Frederick email Re: Updates on issue, dated 2-8-17	Sherrod 01929
102				Jones email chain Re: February 19, 2016, dated 2-12-16	Sherrod 01930-1932
103				Castrellon email Re: Observations from Finance Investigation, dated 3-2-17	Sherrod 01940
104				Sherrod email Re: Recap-Complaints Concerning Finance Staff (2/14/17), dated 2-22-17	Sherrod 01944
105				Smyers email Re: Finance, dated 2-22-17	Sherrod 01945
106				2015 Employee Salary Administration Report	Sherrod 01963-1965
107				McKinney email Re: SVP of Development Hiring Process, dated 3-7-16	Sherrod 01967-1969
108				McKinney email Re: FW: SVP of Development Hiring Process, dated 3-7-16	Sherrod 01970-1974
109				McKinney email Re: FW: SVP of Development Hiring Process, dated 3-9-16	Sherrod 01975-1978
110				Lopez email Re: Review of Incumbent Salary, dated 3-12-15	Sherrod 01997-2004
111				Booker email chain Re: 2-1-1, dated 5-17-17	Sherrod 02005

No.	Date Offered	Marked	Admitted	Description	Bates Stamp
112				Notice of Jones 3-4-16 EEOC Charge, dated 3-24-16	Sherrod 02012-2015
113				Booker email chain Re: Resource Development Enabling Strategy, dated 4-17-16	Sherrod 02026-2029
114				Jones Settlement Agreement, dated 5-6-15	Sherrod 02031-2038
115				Jones letter to Sherrod re retaliation, dated 5-19-16	Sherrod 02042
116				Jones memo Re: Responses to UWTC Internal Investigation, dated 6-6-16	Sherrod 02045-2056
117				Jones email chain Re: Strategic Review Retaliation, dated 6-2-16	Sherrod 02057-2058
118				McKinney email chain Re: Board correspondence re succession planning, dated 7-20-16	Sherrod 02080
119				Buehler email chain Re: FW: TD Smyers recommendation for COO/Development Officer, dated 7-18-16	Sherrod 02081
120				Buehler email chain Re: FW: TD Smyers recommendation for COO/Development Officer, dated 7-18-16	Sherrod 02082-2083
121				Pearson Partners International COO/CDO Search Update and related documents	Sherrod 02087-2145
122				Buehler email chain Re: FW: Letter from Board Chair Scott Spiker, dated 7-18-16	Sherrod 02182-2183

No.	Date Offered	Marked	Admitted	Description	Bates Stamp
123				Spiker letter to UWTC Board of Directors, dated 10-15-15	Sherrod 02184-2185
124				Buehler email chain Re: FW: FW: TD Smyers' Transition, dated 7-18-16	Sherrod 02188-2190
125				Smyers email chain Re: 2-2-1 Pay Discrepancies, dated 12-1-16	Sherrod 02195-2196
126				Boyd email on behalf of McKinney re: Star-Telegram article, dated 12-19-16	Sherrod 02197
127				Historical Base Salary, Ann Rice with handwritten additions	Sherrod 02198
128				Job Description, Executive Vice President Community Development and Chief Operating Officer	Sherrod 02199-2201
129				Ann Rice Salary Documents	Sherrod 02202-2215
130				Written Warning, dated 2-21-12	Sherrod 02216
131				Personnel records, C. McQuitty	Sherrod 02217-2237
132				Jones Investigation documents, dated 6-29-16	Sherrod 02241-2254
133				Smyers email Re: The Strategic Planning Process and Our Community Development Enabling Strategy, dated 2-28-16	Sherrod 02255-2268
134				Pharr letter to McKinney, dated 4-2-12	Sherrod 02310

No.	Date Offered	Marked	Admitted	Description	Bates Stamp
135				Personnel Records, L. Pharr	Sherrod 02316-2377
136				Pharr Offer Letter and Historical Base Salary, M. Jones	Sherrod 02378
137				MacLeod letter to McKinney Re: Marilyn Jones' Title and Compensation, dated 2-4-15	Sherrod 02379-2380
138				Job Description, Sr. Vice President, Community Development and Jones Resume	Sherrod 02381-2384
139				Jones letter to McKinney, dated 1-29-15	Sherrod 02385-2386
140				Jones personnel documents	Sherrod 02387-2399
141				Video, https://safeshare.tv/x/FvVTViKOSz (attempting to “spoof” images and videos of confrontations between police officers and African-Americans as a sporting game, and includes statements such as “next year’s games will be brought to you by Travon Martin Hoodies. Remember they only come in two colors: ‘Michael Brown’ and ‘Freddie Gray.’”) <i>Last visited Jan. 26, 2018.</i>	
142				Employee Information Tables	Sherrod 02521-2534
143				McKinney email Re: 403(b) Plan Record Keeper Recommendation, dated 1-31-17	Sherrod 02535

No.	Date Offered	Marked	Admitted	Description	Bates Stamp
144				Calendar, February-March 2017	Sherrod 02536-2541
145				Recordkeeper Search Analysis, dated 12-13-16	Sherrod 02542-2575
146				McKinney email Re: Leah King, dated 5-8-17	Sherrod 02605
147				Photograph, Leah King mailings	Sherrod 02607
148				United Way Worldwide Code of Ethics Guide	Sherrod 02614-2629
149				2015 Employee Salary Administration Report	Sherrod 02630-2634
150				403(b) Plan Recordkeeper Evaluation and Recommendation Executive Summary	Sherrod 02638-2640
151				Excerpt, Global Standards for United Way Organizations	Sherrod 02680-2704
152				List of Officers	Sherrod 02778-2779
153				Recordkeeper Search Finalists Review & Recommendation, dated 1-24-17	Sherrod 02798-2811
154				Sherrod recordings	
155				Booker email Re: Fwd: Tim McKinney's Base Pay, dated 1-19-16	Sherrod 02954
156				Qualifications Comparison, McQuitty, Jones	Sherrod 03278
157				Job Description, President and CEO	Sherrod 03279-3281
158				Jones Resume	Sherrod 03282-3283

No.	Date Offered	Marked	Admitted	Description	Bates Stamp
159				McQuitty Resume	Sherrod 03295-3296
160				Pharr email Re: Interesting . . . , dated 2-9-11	Sherrod 03308-3309
161				Executive & Finance Committees recommendation and approval (Tues., March 9, 2004)	Sherrod 03313-3314
162				McKinney email Re: Complaint, dated 4-6-16	Sherrod 03322
163				Sherrod emails Re: Group Benefits Broker – Follow-up, dated 4-27-16	Sherrod 03325-3326
164				McKinney email chain Re: Group Benefits Broker-Follow-up, dated 4-27-16	Sherrod 03327-3328
165				COBRA Election documents, Sherrod, dated 5-5-17	Sherrod 03333-3335
166				Hairston email Re: Coneisha Sherrod- COBRA Benefits Update, dated 6-7-17	Sherrod 03344
167				Committee Oversight Items	Sherrod 03350
168				Succession Planning Sub-Committee minutes, dated 1-20-15	Sherrod 03358-3360
169				Calendar, March 4, 2017	Sherrod 03363
170				McKinney memo Re: Senior Management Contingency/Succession Plan, dated 12-12-11	Sherrod 03364-3366
171				Pavlic email chain Re: Revised W-2's, dated 2-23-17	Sherrod 03369-3370

No.	Date Offered	Marked	Admitted	Description	Bates Stamp
172				Lopez email chain Re: HR, dated 4-27-16	Sherrod 03373-3375
173				Statement to the Executive Committee re: Jones, dated 5-4-16	Sherrod 03377-3386
174				Gutierrez email chain Re: Recommendation to modify current healthcare costs to employees	Sherrod 03390-3398
175				Jones email chain Re: Pay Issues, dated 12-2-16	Sherrod 03541-3547
176				Officers, Directors, Trustees, Key Employees, Etc. Excel Spreadsheet	Sherrod 03753
177				Chambers email chain Re: “??”, dated 7-19-16	UWTC_001180-1182
178				Turner email Re: UWTC/Jones investigation, dated 8-5-16	UWTC_001203-1204
179				Organizational Charts, dated 6-27-16	UWTC_001235-1243
180				Handwritten Notes	UWTC_001096-1100
181				Handwritten Notes	UWTC_001112-1127
182				Proposed Committee Restructuring	UWTC_001129
183				Handwritten Notes	UWTC_001149-1158
184				McKinney email Re: TD Smyers, dated 9-26-16	UWTC_000184

No.	Date Offered	Marked	Admitted	Description	Bates Stamp
185				Smyers email chain Re: Cancelling meeting for Monday March 6, dated 3-2-17	UWTC_000185-186
186				Boyd email Re: Calendar for March 2nd, dated 3-2-17	UWTC_000187
187				Boyd calendar notice Re: Monthly (February) Meeting with TD and Coneisha, dated 3-6-17	UWTC_000188
188				Boyd calendar notice Re: Weekly Meeting with Beverly – Cancelled, dated 3-6-17	UWTC_000189
189				Boyd email Re: Monthly Meeting with TD Smyers and Coneisha Sherrod, dated 2-28-17	UWTC_000190-191
190				Boyd email Re: Monthly Meeting with TD Smyers and Coneisha Sherrod, dated 12-12-16	UWTC_000192
191				Equifax Fax Cover Sheet Re: Coneisha Sherrod, dated 3-27-17	UWTC_000193
192				Sherrod email Re: Benefits Manager Corporate Gift, dated 10-21-16	UWTC_000292-293
193				Smyers email chain Re: Please Remove Sherrod System Access, dated 3-3-17	UWTC_000298-301
194				Smyers email chain Re: Monthly Meeting with TD Smyers and Coneisha Sherrod, dated 2-27-17	UWTC_000305-307

No.	Date Offered	Marked	Admitted	Description	Bates Stamp
195				Lyttle email chain Re: Recap-Complaints Concerning Finance Staff (2/14/17), dated 2-27-17	UWTC_000311-315
196				Organizational Charts	UWTC_0001-20
197				Sherrod Resume and Recommendation letters	UWTC_000122-127
198				Smyers Resume	UWTC_000139
199				United Way 990's	
200				Sherrod Lost Pay Summary	
201				Calendars	
202				Chambers Recordings	

Pursuant to the Court's Scheduling Order (Doc. No. 19), the parties have conferred regarding objections to exhibits (except for FRE 402 and 403 objections). Those objections are identified on the attached list.

/s/ **Brian Sanford**

Brian Sanford
Counsel for Plaintiff

/s/ **James T. McBride**

James T. McBride
Counsel for Defendant

Respectfully submitted,

By: /s/ **Brian P. Sanford**

Brian P. Sanford
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David B. Norris
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**ATTORNEYS FOR PLAINTIFF
CONEISHA SHERROD**

CERTIFICATE OF SERVICE

On November 15, 2016, I electronically submitted the foregoing document with the clerk of court for the U.S. District Court, Northern District of Texas, using the electronic case filing system of the court. I hereby certify that I have served all counsel of record electronically or by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

 /s/ Brian P. Sanford